

EXHIBIT 105

1

VOLUME 1
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST)
PUBLISHING CORPORATION,)
Plaintiffs and) C.A. No. 20-613 (LPS)
Counterdefendants,)
v.) HIGHLY CONFIDENTIAL
ROSS INTELLIGENCE, INC.,)
Defendant and)
Counterclaimant.)

)

VIDEOTAPED DEPOSITION of ANDREW ARRUDA

- CONDUCTED BY VIDEOCONFERENCE -

Wednesday, March 30, 2022

9:06 a.m. Pacific Daylight Time

Michelle Keegan, RMR, CRR

Lexitas

508-478-9795 ~ 508-478.0595 (Fax)

www.LexitasLegal.com

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1 A P P E A R A N C E S:

2

3 KIRKLAND & ELLIS LLP
4 By: Dale Cendali, Esq.
By: Eric Loverro, Esq.
601 Lexington Avenue
5 New York, New York 10022
Phone: (212) 226-4800
6 Email: dale.cendali@kirkland.com
Email: eric.loverro@kirkland.com
7 Counsel for Plaintiffs Thomson Reuters and West
Publishing

8

9 CROWELL & MORING LLP
10 By: Warrington Parker, Esq.
3 Embarcadero Center, 26th Floor
San Francisco, California 94111
11 Phone: (415) 986-2800
Email: wparker@crowell.com
12 Counsel for Defendant ROSS Intelligence, Inc.

13

14 CROWELL & MORING LLP
By: Crinesha B. Berry, Esq.
1001 Pennsylvania Avenue NW
15 Washington, D.C. 20004
Phone: (202) 624-2500
Email: cberry@crowell.com
16 Counsel for Defendant ROSS Intelligence, Inc.

17

18 Also Present:
Adrian Beltran, Videographer

19

20

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3

1 I N D E X

2 Videotaped Deposition of: Page

3 ANDREW ARRUDA

4 By Ms. Cendali 9

6 E X H I B I T S

7 No. Page

8 Exhibit 1 [Proposed] Stipulated Protective 17
9 Order, in USDC, District of
10 Delaware, 20-613 (LPS), 27 pages
without Bates numbering11 Exhibit 2 Andrew Arruda LinkedIn profile 26
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13 ROSS-003487472 through -747414 Exhibit 4 Document titled "Powered by IBM 102
Watson Application
15 Executive Summary,"
16 Bates-numbered ROSS-003705907
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18-cv-01445, three pages without
19 Bates numbering20 Exhibit 6 Facebook pages, Bates-numbered 115
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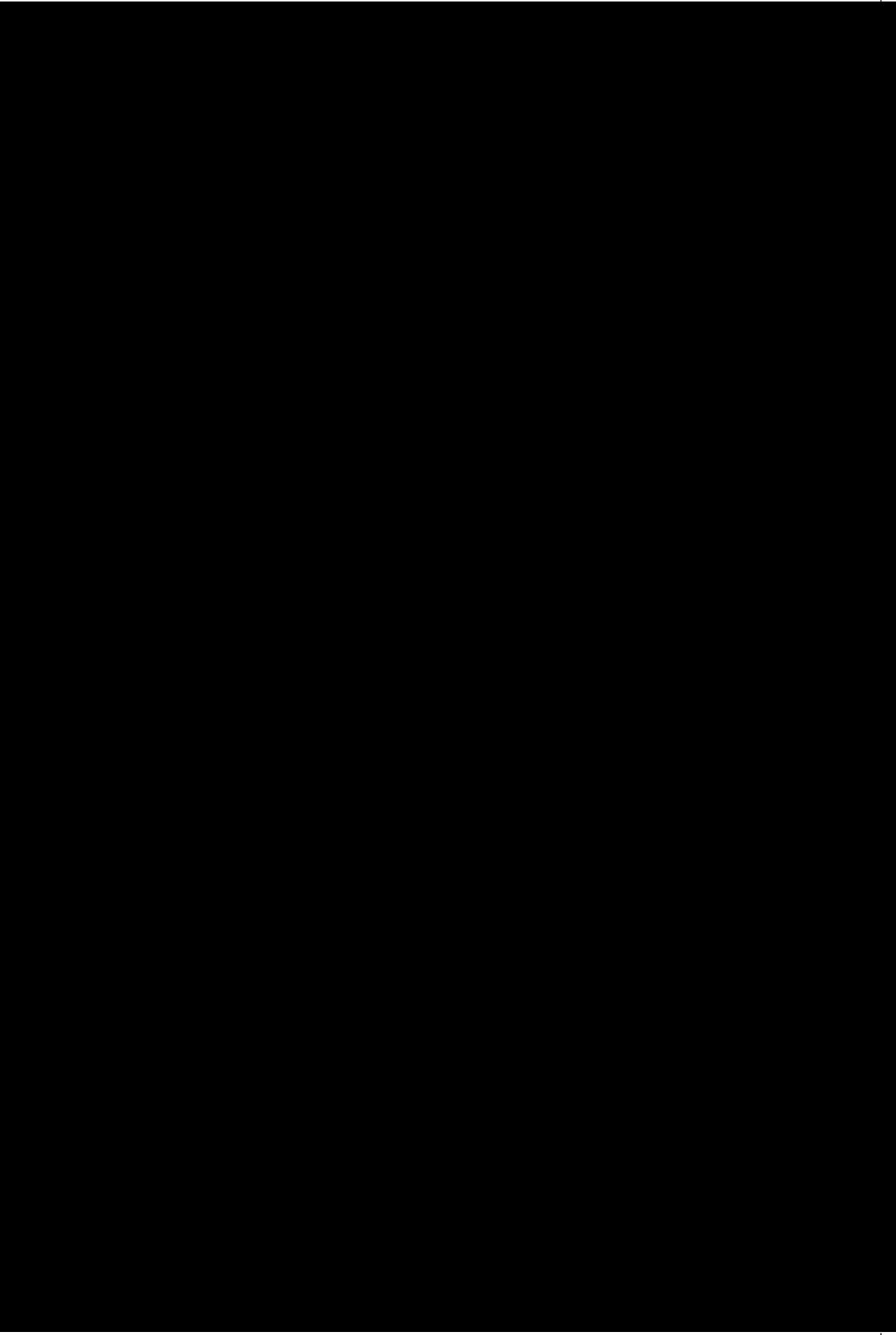


EXHIBIT 106

2

1 VIDEOTAPED DEPOSITION OF PARGLES DALL'OGLIO

2 BE IT REMEMBERED that on Wednesday,

3 March 9, 2022, commencing at the hour of 9:28 a.m.

4 thereof, before me, Kathleen A. Maltbie,

5 RPR-RMR-CRR-CCRR-CLR-CRC, a Certified Stenographic

6 Shorthand Reporter, in and for the State of

7 California, personally appeared PARGLES DALL'OGLIO,

8 remotely via Zoom videoconference, a witness in the

9 above-entitled court and cause, who, being by me

10 first remotely duly sworn, was thereupon examined as

11 a witness in said action.

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3

1 APPEARANCES OF COUNSEL

2 FOR THE PLAINTIFFS AND COUNTERDEFENDANTS:

3 KIRKLAND & ELLIS LLP
4 601 Lexington Avenue
5 New York, New York 10022
6 BY: JOSHUA L. SIMMONS, ESQ.
7 ERIC A. LOVERRO, ESQ.
Telephone: (212) 446-4800
Email: Joshua.simmons@kirkland.com
Eric.loverro@kirkland.com

7 FOR THE DEFENDANT AND COUNTERCLAIMANT:

8 (Via Zoom Videoconference)
9 CROWELL & MORING LLP
10 Three Embarcadero Center, 26th Floor
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12 BY: KAYVAN M. GHAFFARI, ESQ.
KEVIN C. CACABELOS, ESQ.
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Email: Kghaffari@crowell.com
kcacabelos@crowell.com

13 ALSO PRESENT:

14 (Via Zoom Videoconference)
15 Jacob Figueroa, Videographer

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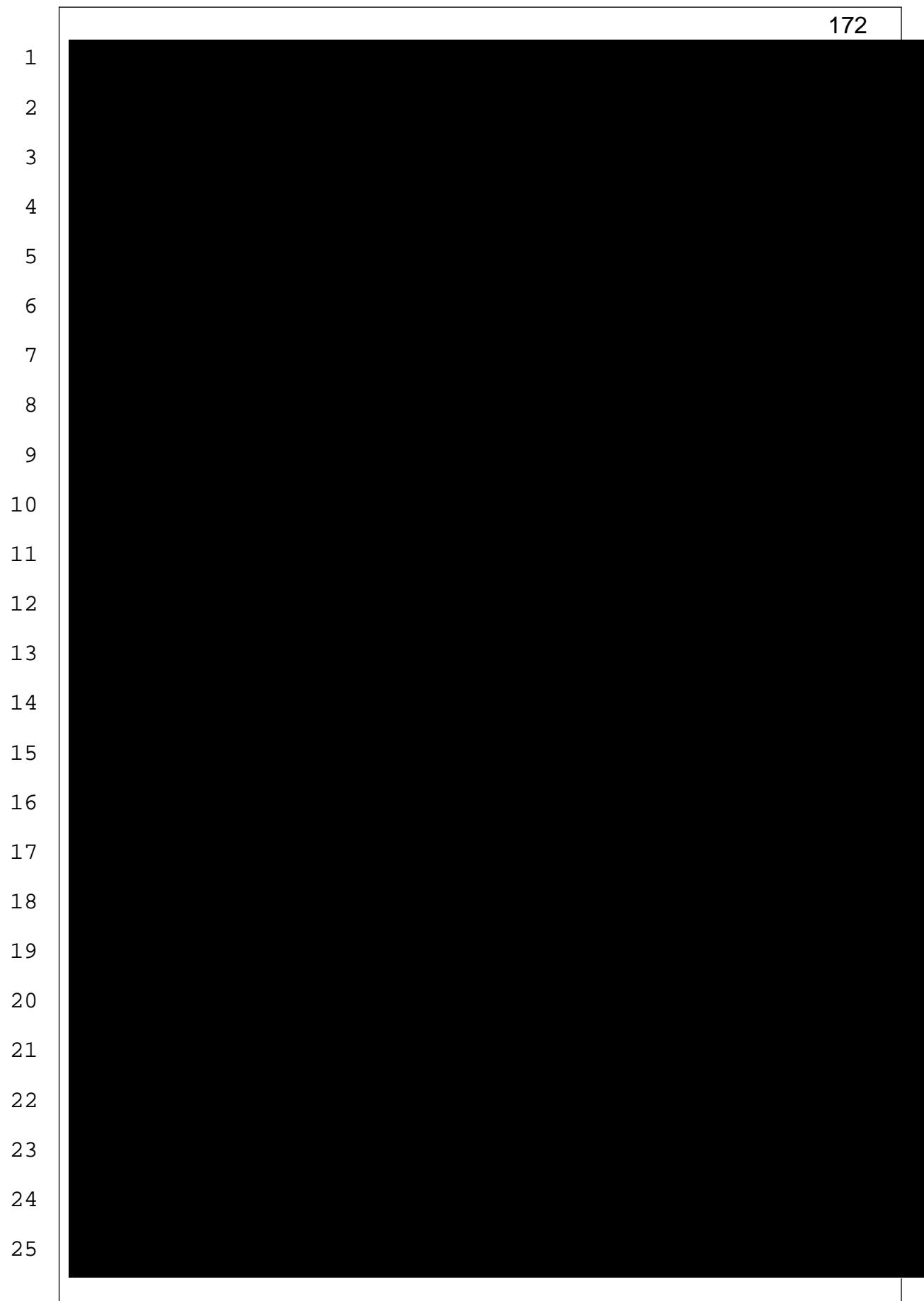


EXHIBIT 107

Thomas Hamilton
May 04, 2023

1

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE
4 Case No. 20-613 (LPS)

5 IN RE MATTER OF:

6 THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST
PUBLISHING CORPORATION,

7 Plaintiffs and
8 Counter-Defendants,

9 vs.

10 ROSS INTELLIGENCE INC.,

11 Defendant and
Counterclaimant.

12 -----
13 ** HIGHLY CONFIDENTIAL **

14 ** ATTORNEYS' EYES ONLY **

16 REMOTE VIDEOTAPED DEPOSITION OF

17 THOMAS HAMILTON

19 Thursday, May 4, 2023

20 11:57 a.m. (EST)

23 Reported By:

24 Joan Ferrara, RMR, FCRR

25 Job No. 2023-892415

2

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4 May 4, 2023

5 11:57 a.m. (EST)

6

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9 Videotaped Deposition of THOMAS
10 HAMILTON, held remotely via Zoom, before
11 Joan Ferrara, a Registered Merit Reporter,
12 Federal Certified Realtime Reporter and
13 Notary Public.

14

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Thomas Hamilton
May 04, 2023

3

1 REMOTE APPEARANCES:

4 ON BEHALF OF PLAINTIFFS/COUNTER-DEFENDANTS:

5 KIRKLAND & ELLIS LLP

6 200 Clarendon Street

7 Boston, Massachusetts 02116

8 BY: CHRISTA COTTRELL, ESQ.

9 LEXI WUNG, ESQ.

10
11
12 ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

13 CROWELL & MORING LLP

14 3 Embarcadero Center

15 26th Floor

16 San Francisco, California 94111

17 BY: JOACHIM STEINBERG, ESQ.

18 ANNA SABER, ESQ.

19
20
21 ALSO PRESENT:

22 BRYAN BELTRAN, Videographer

23 JOSE LOPEZ, Kirkland Tech

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EXHIBIT 108

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2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE
4 Case No. 20-613 (LPS)

5 IN RE MATTER OF:

6 THOMSON REUTERS ENTERPRISE
7 CENTRE GMBH and WEST
8 PUBLISHING CORPORATION,

9 Plaintiffs and
10 Counter-Defendants,

11 vs.

12 ROSS INTELLIGENCE INC.,

13 Defendant and
14 Counterclaimant.

15 -----
16 ** HIGHLY CONFIDENTIAL **

17 ** ATTORNEYS' EYES ONLY **

18 REMOTE VIDEOTAPED DEPOSITION OF

19 PETER MARTIN, J.D.

20 Thursday, August 3, 2023

21 8:59 a.m. (CST)

22 Reported By:

23 Joan Ferrara, RMR, FCRR

24 Job No. 2023-905291

2

1

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3

4 August 3, 2023

5 8:59 a.m. (CST)

6

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8

9 Highly Confidential Videotaped

10 Deposition of PETER MARTIN, J.D., held
11 remotely via Zoom, before Joan Ferrara, a
12 Registered Merit Reporter, Federal
13 Certified Realtime Reporter and Notary
14 Public.

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3

1 REMOTE APPEARANCES:

2
3
4 ON BEHALF OF PLAINTIFFS/COUNTER-DEFENDANTS:

5 KIRKLAND & ELLIS LLP

6 200 Clarendon Street

7 Boston, Massachusetts 02116

8 BY: MAX SAMELS, ESQ.

9
10
11 ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

12 CROWELL & MORING LLP

13 3 Embarcadero Center

14 26th Floor

15 San Francisco, California 94111

16 BY: JACOB CANTER, ESQ.

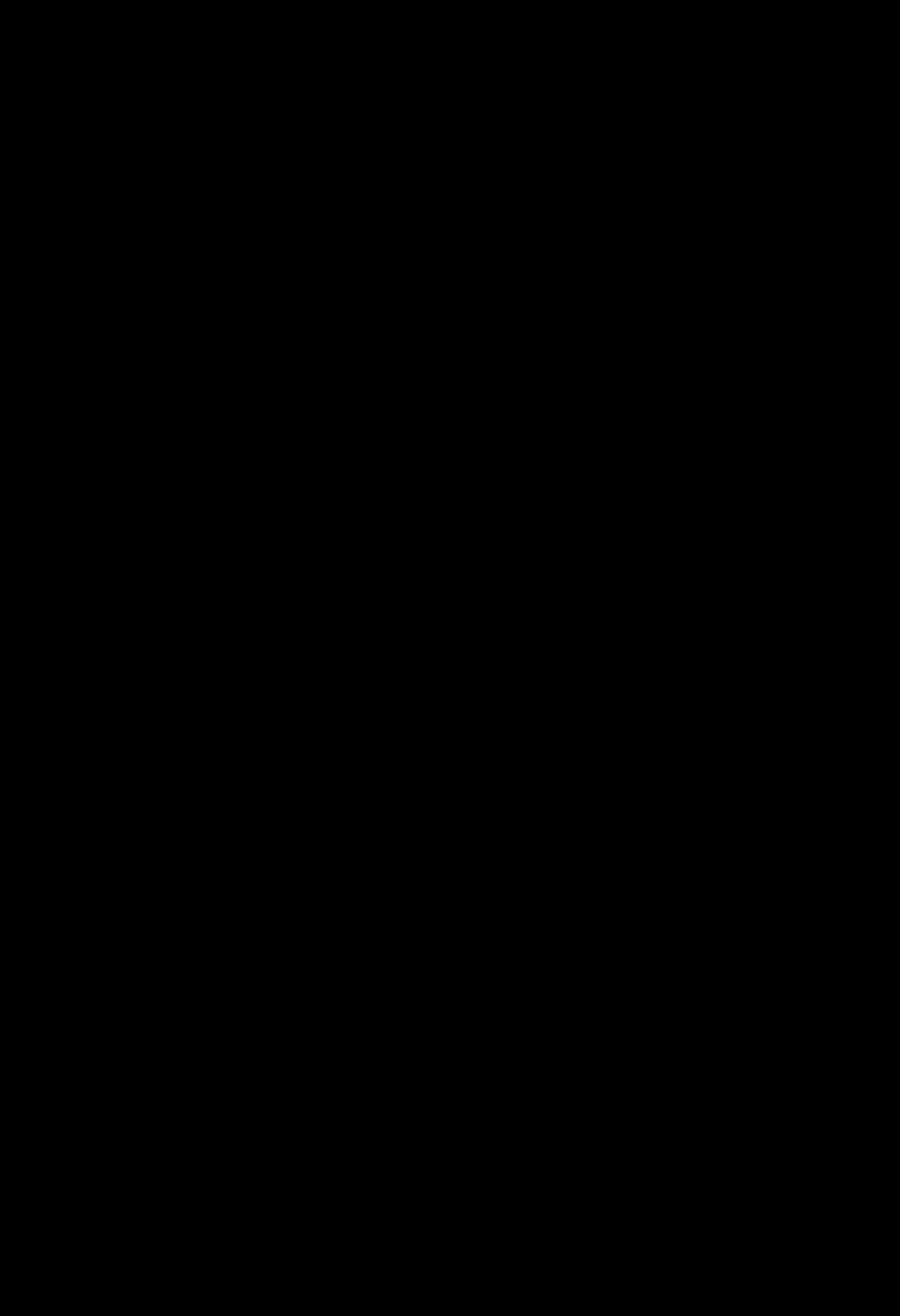
17 WARRINGTON PARKER, ESQ.

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20 ALSO PRESENT:

21 ADRIAN BELTRAN, Videographer

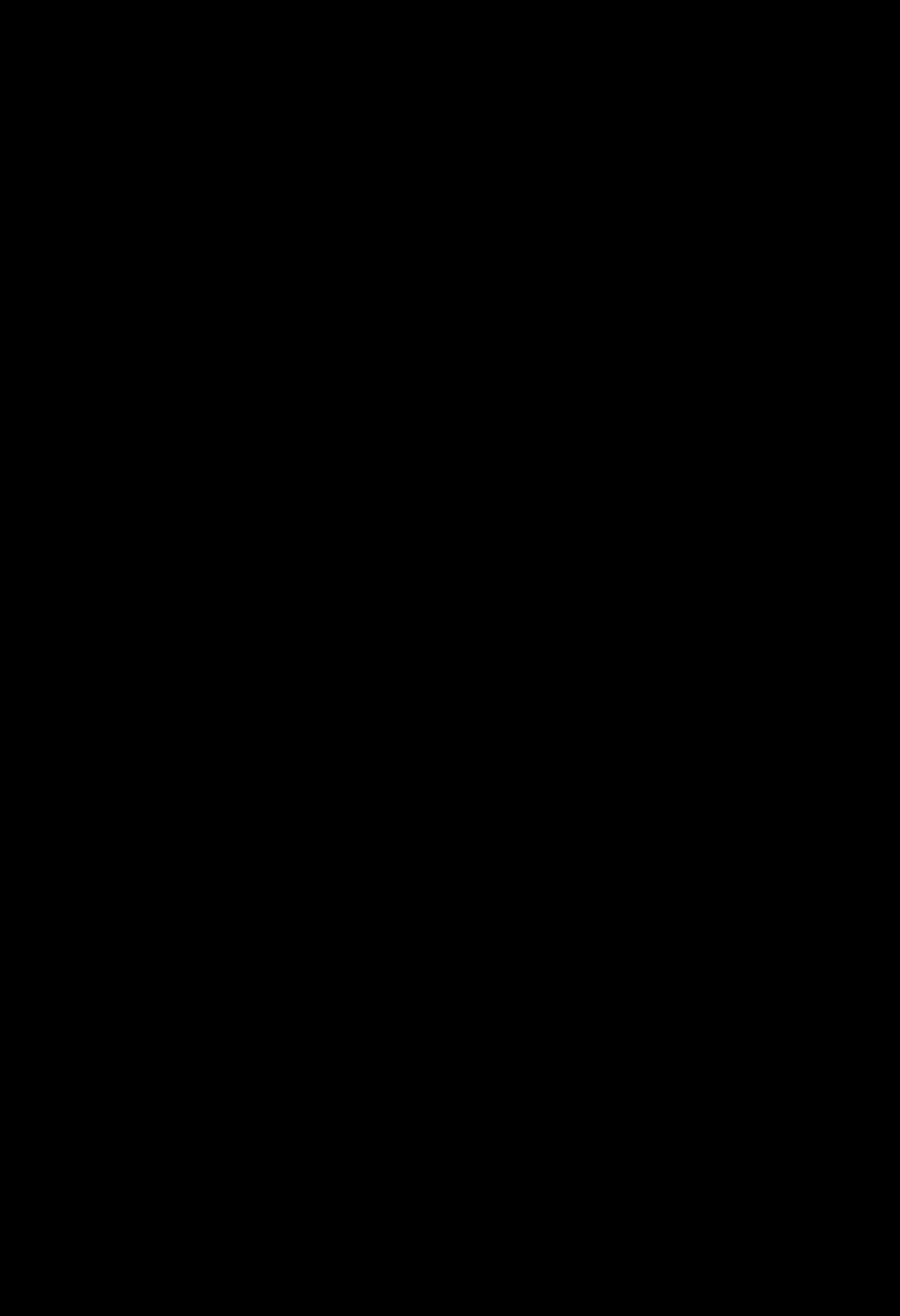
22 JEREMY YOUNG, Kirkland Tech

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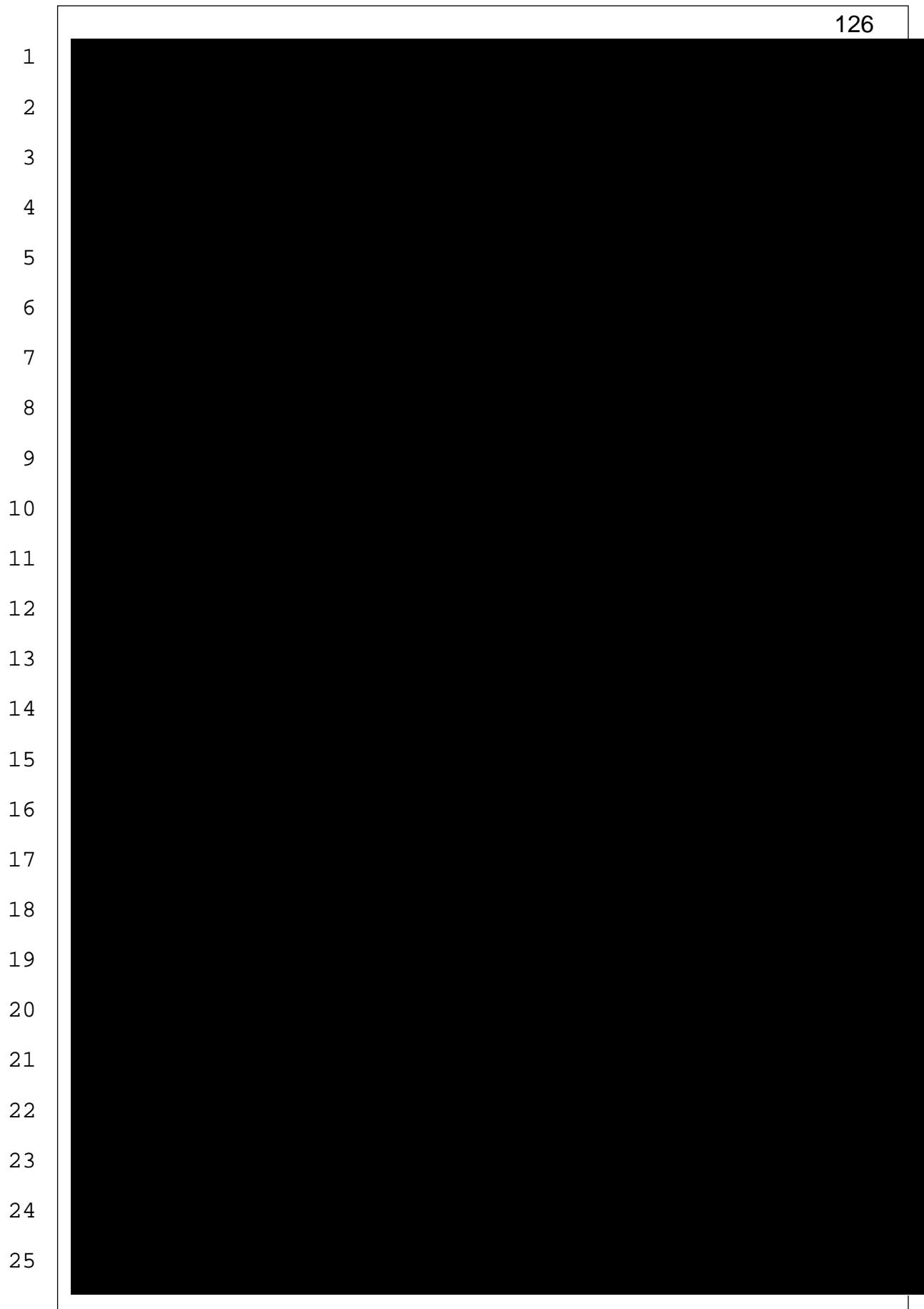


EXHIBIT 109

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF DELAWARE

3

4 _____

5 THOMSON REUTERS ENTERPRISE)

6 CENTRE GMBH and WEST)

7 PUBLISHING CORPORATION,)

8 Plaintiffs and) C.A. No. 20-613

9 Counterdefendants) (LPS)

10 v.)

11 ROSS INTELLIGENCE, INC.,) HIGHLY CONFIDENTIAL

12 Defendant and)

13 Counterclaimant.)

14 _____)

15

16

17 --- This is the transcript of the videotaped

18 Deposition of, JIMOH OVBIAGELE, taken at the

19 offices of Regus - Toronto Airport Corporate

20 Centre, Mississauga, Ontario, Canada, on the

21 12th day of April, 2022.

22 -----

23

24 REPORTED BY: Helen Martineau, CSR

25 VIDEOGRAPHER: Bruno Silva

2

1 A P P E A R A N C E S:

2 FOR THE PLAINTIFF:

3 KIRKLAND & ELLIS LLP

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5 & Eric Loverro, Esq.

6 601 Lexington Avenue

7 New York, New York

8 Tel. (212) 446-4989

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10 eric.loverro@kirkland.com

11

12 FOR THE DEFENDANT:

13 CROWELL & MORING LLP

14 PER: Warrington Parker, Esq.

15 & Jacob Canter, Esq.

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17 San Francisco, California

18 94111

19 Tel. (415) 365-7234

20 Email: wparker@crowell.com

21 jcanter@crowell.com

22

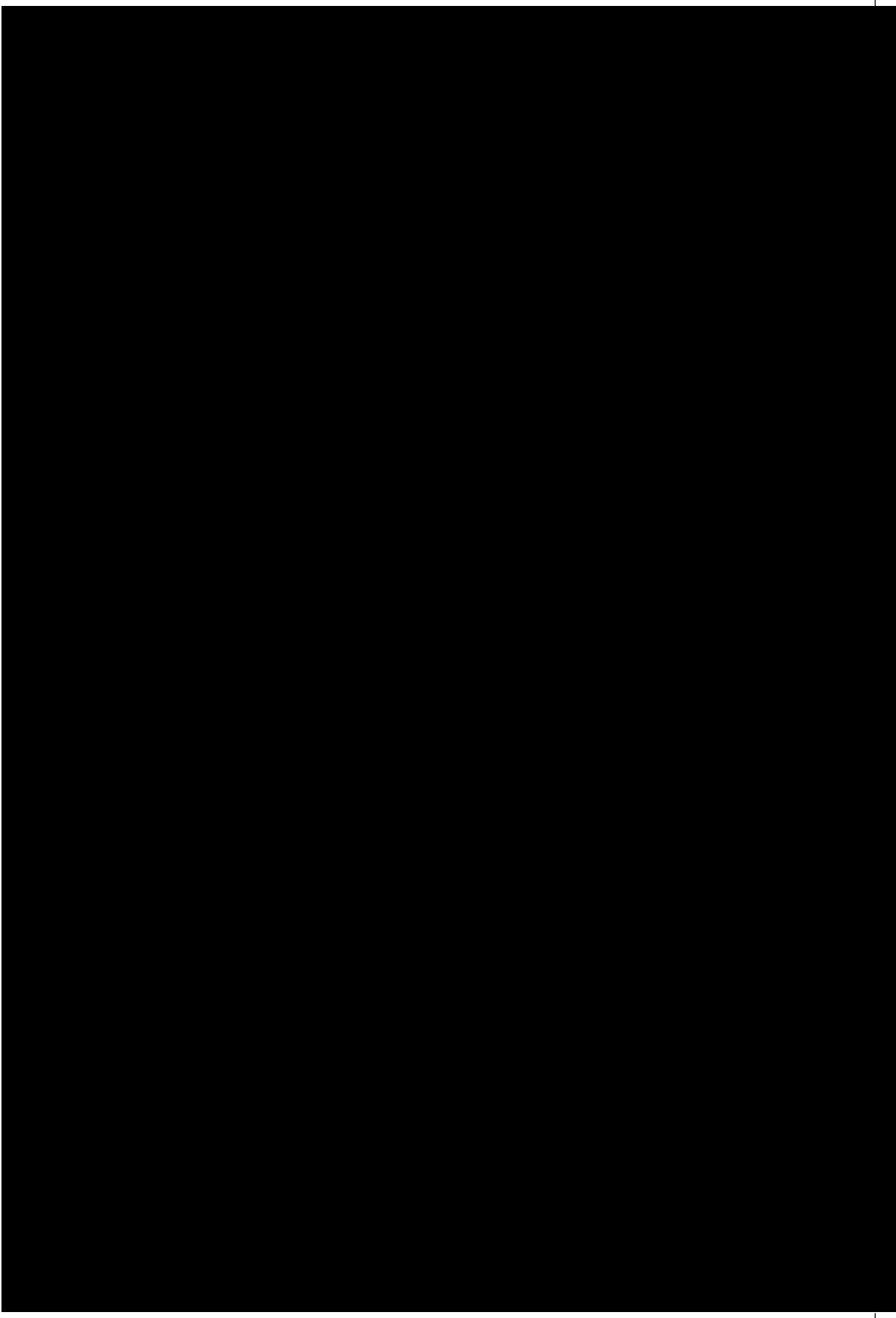
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EXHIBIT 110

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2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE
4 Case No. 20-613 (LPS)

5 IN RE MATTER OF:

6 THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST
PUBLISHING CORPORATION,

7 Plaintiffs and
8 Counter-Defendants,

9 vs.

10 ROSS INTELLIGENCE INC.,

11 Defendant and
Counterclaimant.

12 -----

13 ** HIGHLY CONFIDENTIAL **

14 ** ATTORNEYS' EYES ONLY **

15
16 REMOTE VIDEOTAPED DEPOSITION OF
17 JIMOH OVBIAGELE

18
19 Tuesday, May 2, 2023

20 8:02 a.m. (CST)

21
22
23 Reported By:

24 Joan Ferrara, RMR, FCRR

25 Job No. 2023-892413

2

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4 May 2, 2023

5 8:02 a.m. (CST)

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9 Videotaped Deposition of JIMOH

10 OVBIAGELE, held remotely via Zoom, before

11 Joan Ferrara, a Registered Merit Reporter,

12 Federal Certified Realtime Reporter and

13 Notary Public.

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3

1 REMOTE APPEARANCES:

2
3
4 ON BEHALF OF PLAINTIFFS/COUNTER-DEFENDANTS:

5 KIRKLAND & ELLIS LLP

6 200 Clarendon Street

7 Boston, Massachusetts 02116

8 BY: DANIEL LAYTIN, ESQ.

9
10
11 ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

12 CROWELL & MORING LLP

13 3 Embarcadero Center

14 26th Floor

15 San Francisco, California 94111

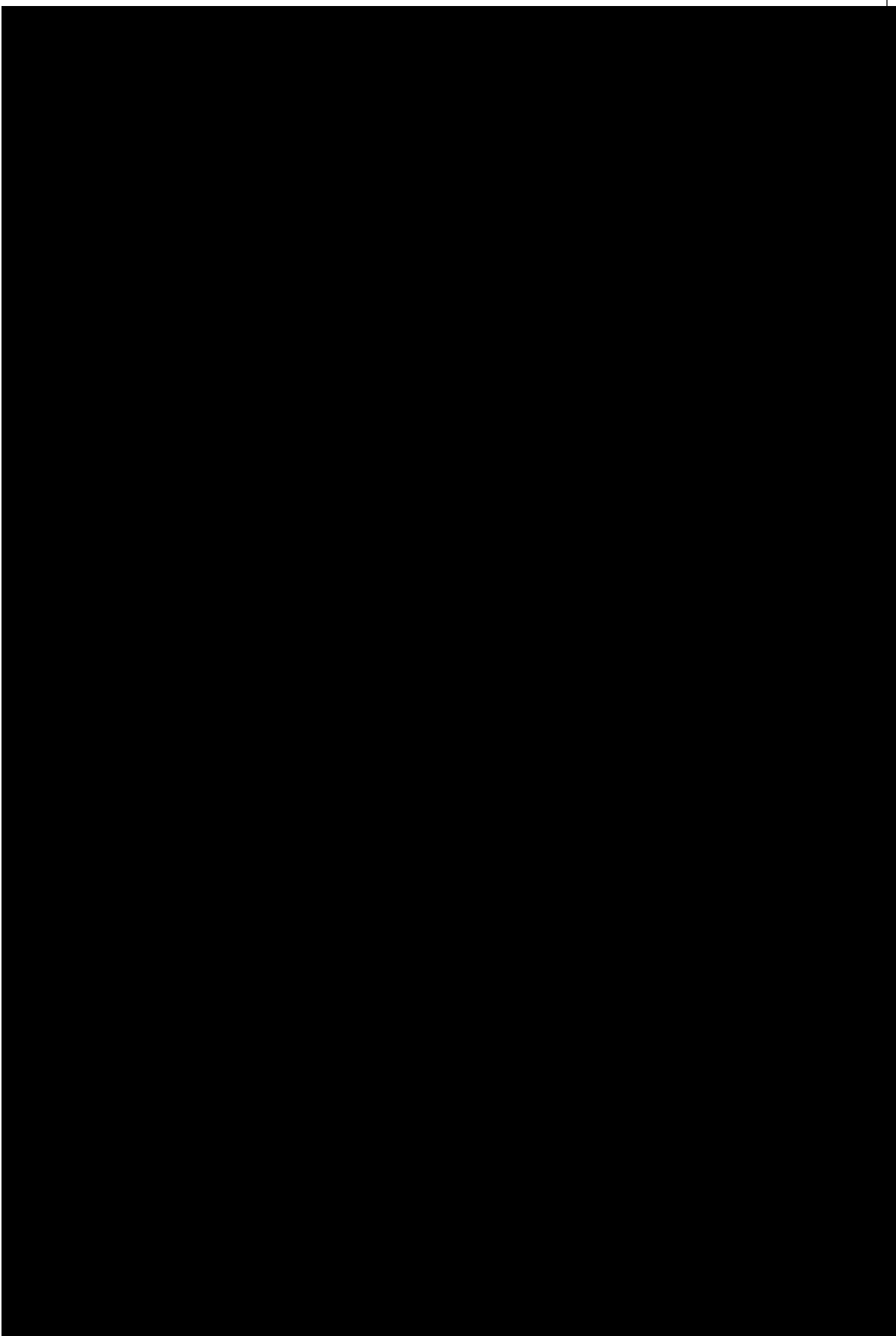
16 BY: WARRINGTON PARKER, ESQ.

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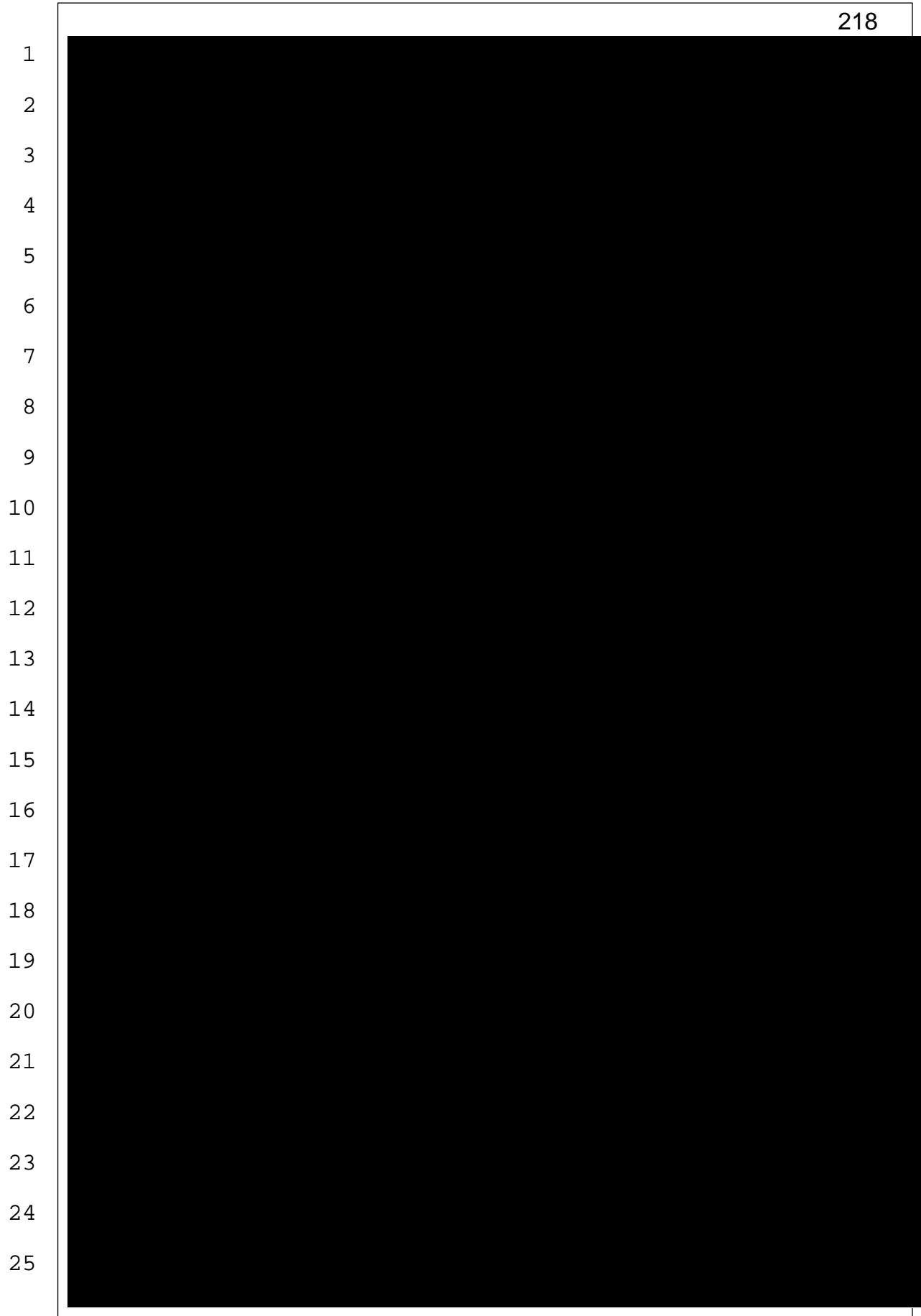
20 LARRY GRISBY, Videographer

21 JOSE LOPEZ, Kirkland Tech

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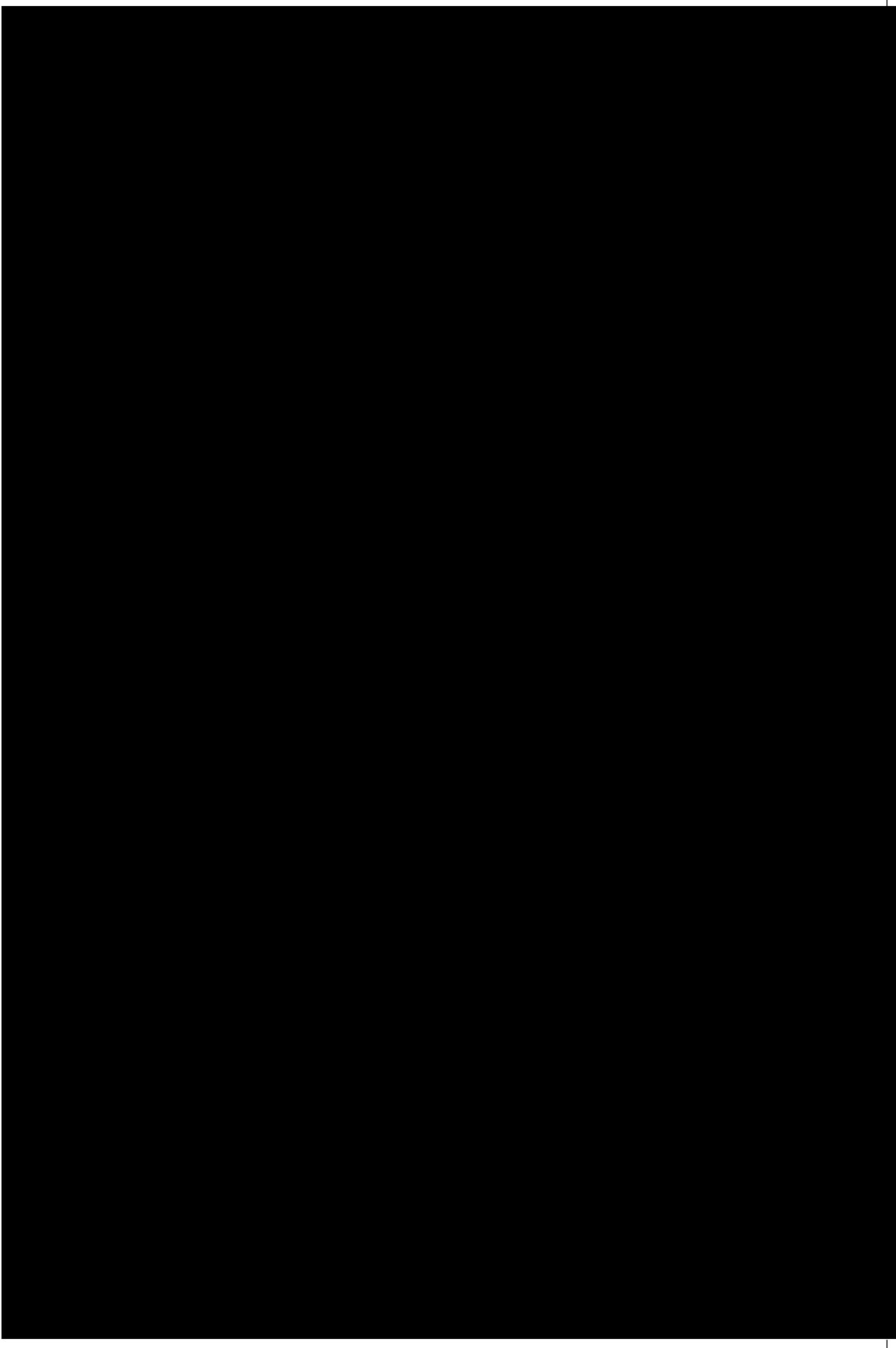


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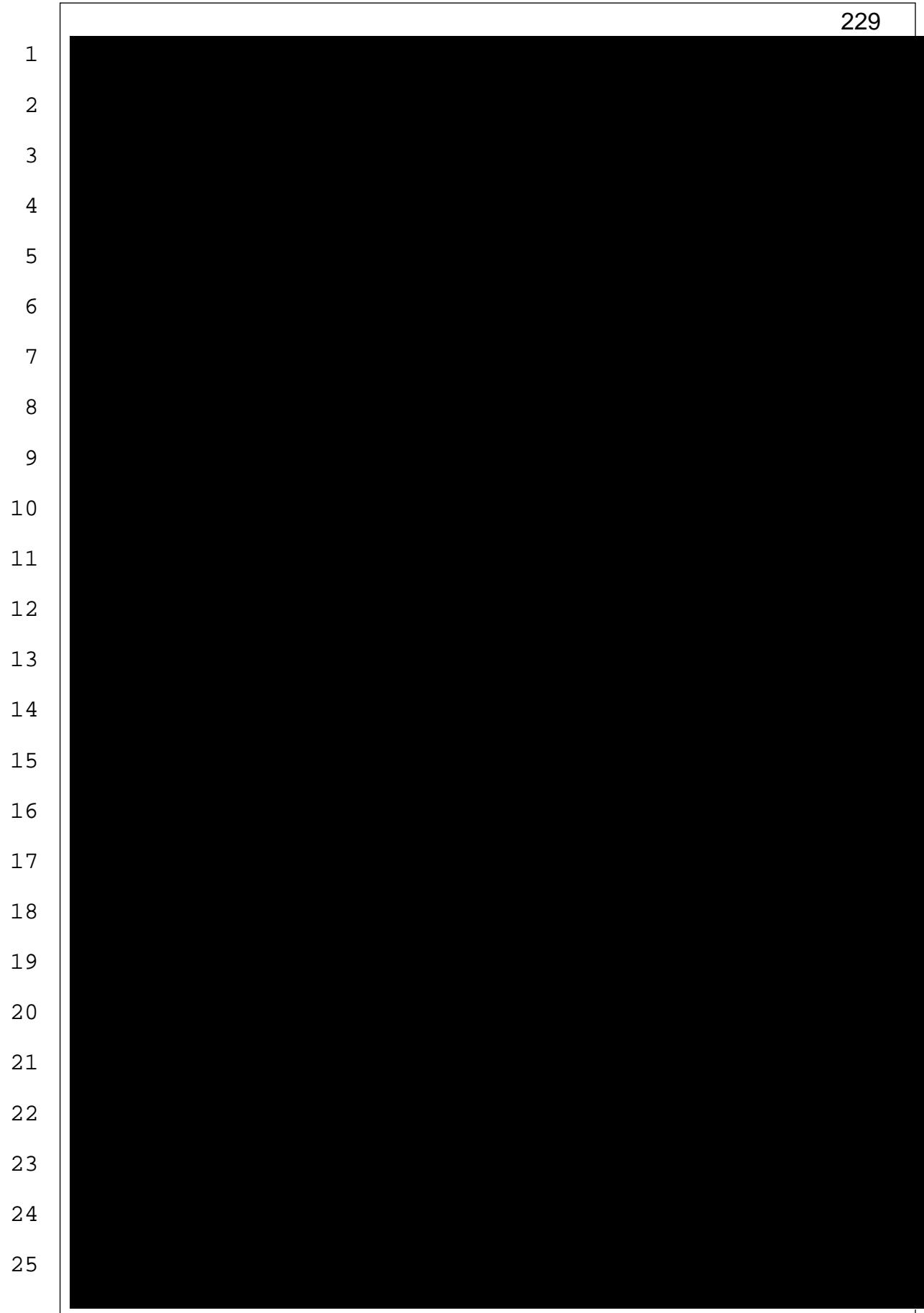


EXHIBIT 111

1

2 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

3 -----X

4 THOMSON REUTERS ENTERPRISE CENTRE GMBH and
WEST PUBLISHING CORPORATION,

5 Plaintiffs,

6 v.

7 ROSS INTELLIGENCE INC.,

8 Defendant.

9 -----X

9 ***HIGHLY CONFIDENTIAL***

10

11 VIDEOTAPED DEPOSITION OF JIM RATLIFF

12

13

14

15 DATE: July 28, 2023

16 TIME: 9:40 a.m. Central

17 PLACE: ***REMOTE***

18 BEFORE: Rebecca Schaumloffel, RPR, CCR-NJ

19 JOB NO: 2023-905290

20

21

22

23

24

25

Jim Ratliff
July 28, 2023

2

1

2 APPAREANCES:

3

4 KIRKLAND & ELLIS LLP
5 Attorneys for the Plaintiff
6 601 Lexington Avenue
7 New York, New York 10022
8 BY: CHRISTA COTTRELL, ESQ.
9 LEXI WUNG, ESQ.

10

11

12 CROWELL & MORING LLP
13 Attorneys for the Defendant
14 3 Embarcadero Center
15 San Francisco, California 94111
16 BY: MATT MCBURNEY, ESQ.
17 CRINESHA BERRY, ESQ.
18 BEATRICE NGUYEN, ESQ.

19

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16 ALSO PRESENT:

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Roman Bielski, Kirkland

Joshua Clarke, Lexitas

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J. RATLIFF

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J. RATLIFF

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J. RATLIFF

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J. RATLIFF

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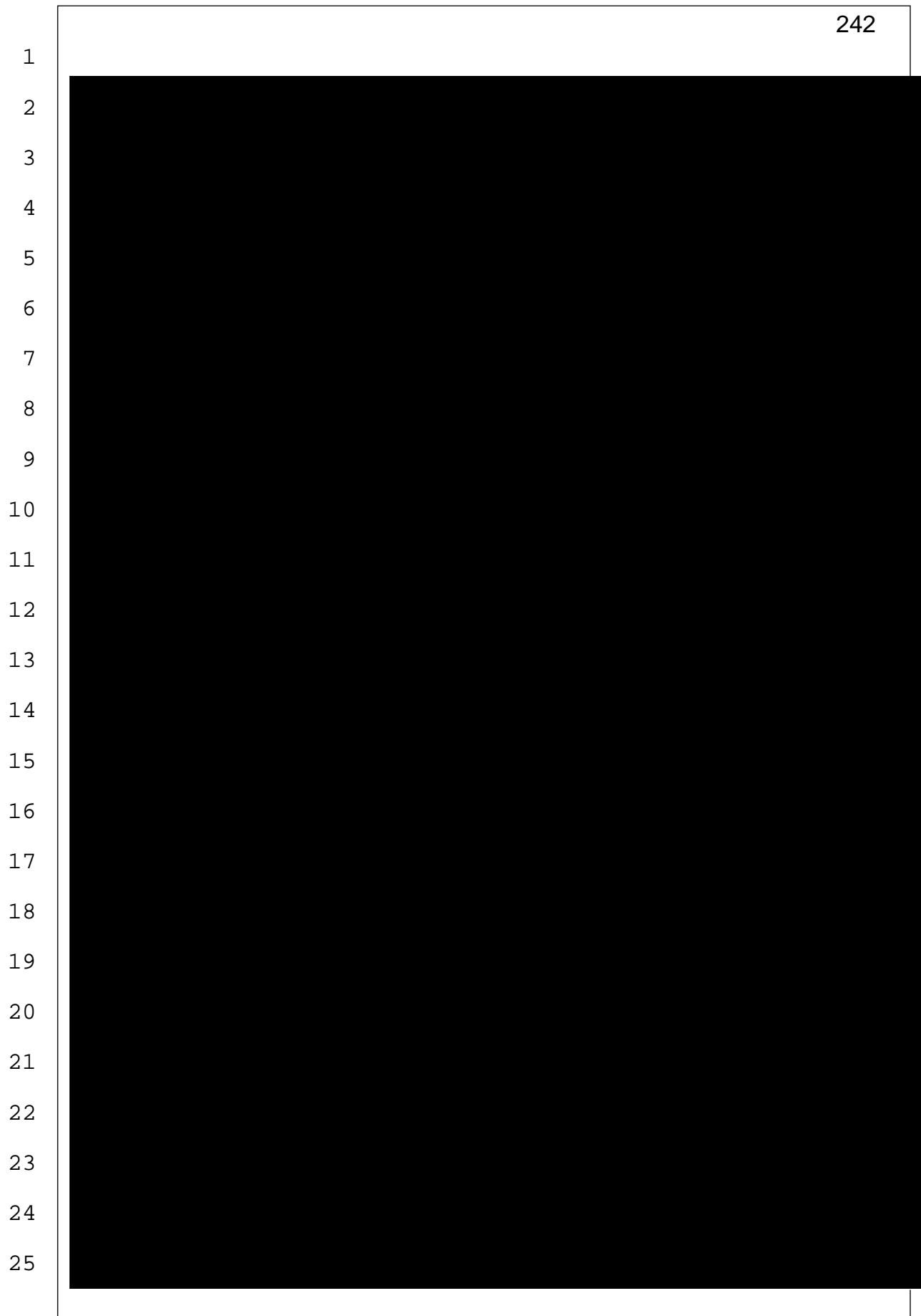


EXHIBIT 112

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF DELAWARE

3
4 IN RE MATTER OF:)
5 THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST)
6 PUBLISHING CORPORATION,)
Plaintiffs and)
Counterdefendants,)
vs.) C.A. No. 20-613(LPS)
ROSS INTELLIGENCE INC.,)
Defendant and)
Counterclaimant.)
12
13 HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY
14 VIDEOTAPED DEPOSITION OF SEAN O. SHAFIK
15 LOS ANGELES, CALIFORNIA
16 Friday, April 22, 2022
17
18 Stenographically Reported by:
19 HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR
Realtime Systems Administrator
20 California CSR License #11600
Oregon CSR License #21-0005
21 Washington License #21009491
Nevada CCR License #980
22 Texas CSR License #10725
23 Job No.: 2022-836111
24
25

2

1 VIDEOTAPED DEPOSITION of SEAN O. SHAFIK, taken
2 before Heather J. Bautista, CSR No. 11600, a Certified
3 Shorthand Reporter for the state of California, with
4 principal office in the county of Santa Clara,
5 commencing on Friday, April 22, 2022, 10:02 a.m., at
6 2049 Century Park East, Suite 3700, Los Angeles,
7 California 90067.

8

9

10

11 APPEARANCES OF COUNSEL:

12

13 For Plaintiffs and Counterdefendants:

14

Kirkland & Ellis LLP
BY: MIRANDA D. MEANS, ESQ.
ROMA LOPES, ESQ.
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Phone: (617) 385-7500
miranda.means@kirkland.com

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19

For Defendant and Counterclaimant:

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BY: JOACHIM B. STEINBERG, ESQ.
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26th Floor
San Francisco, California 94111
Phone: (415) 365-7461
jsteinberg@crowell.com

23

24

ALSO PRESENT: Saxon Christin, Videographer

25

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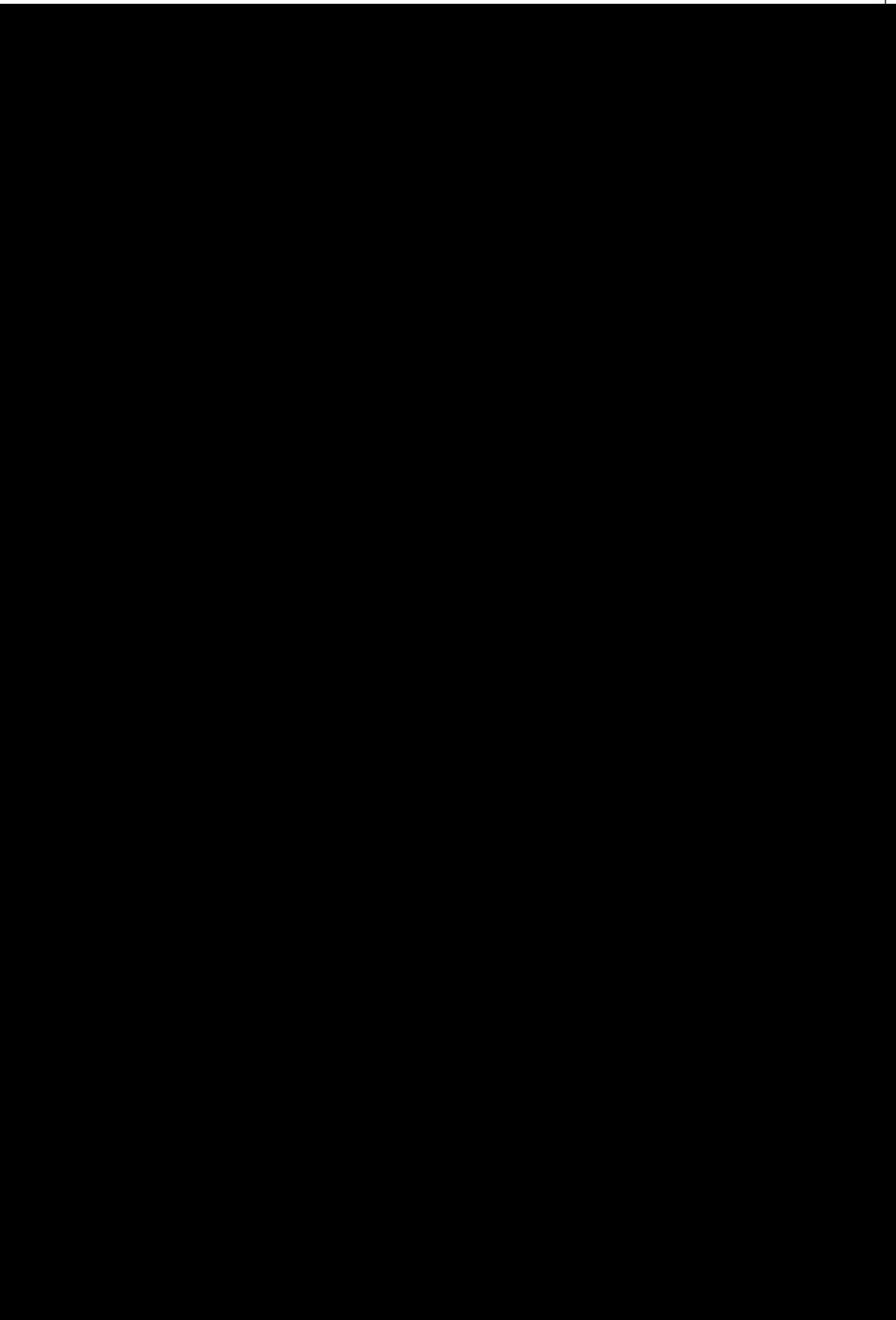


EXHIBIT 113

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Video-recorded deposition of CHAD SYVERSON,
PH.D., taken before TRACY L. BLASZAK, CSR, CRR, and
Notary Public, pursuant to the Federal Rules of Civil
Procedure for the United States District Courts
pertaining to the taking of depositions, at Suite 3600,
455 North Cityfront Plaza Drive, in the City of Chicago,
Cook County, Illinois at 9:01 a.m. on the 2nd day of
August, A.D., 2023.

1 There were present at the taking of this
2 deposition the following counsel:

3 KIRKLAND & ELLIS LLP by
4 MS. CHRISTA C. COTTRELL
5 300 North LaSalle Street
6 Chicago, Illinois 60654
7 (312) 862-2000
8 christa.cottrell@kirkland.com
9 on behalf of the Plaintiffs/
10 Counterdefendants;

11 CROWELL & MORING LLC by
12 MS. BEATRICE B. NGUYEN
13 3 Embarcadero Center
14 Suite 2600
15 San Francisco, California 94111
16 (415) 986-2800
17 bbnguyen@crowell.com
18 on behalf of the Defendant/
19 Counterclaimant;

20 ALSO PRESENT: Mr. Christopher Ody
21 Analysis Group;

22 Mr. Brandon Rackowski
23 Legal Videographer.

24 - - - - -

VIDEO-RECORDED DEPOSITION OF
CHAD SYVERSON, PH.D.

August 2, 2023

EXAMINATION BY:
Ms. Beatrice B. Nguyen

Ms. Christa C. Cottrel

INDEX OF EXHIBITS

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Exhibit 3	Reply report of defendant/counterclaimant's expert James D. Ratliff, Ph.D.	16
Exhibit 4	Report of defendant/counterclaimant's expert Gillian K. Hadfield, J.D., Ph.D.	16
Exhibit 5	Report of defendant/counterclaimant's expert Dr. Peter W. Martin, J.D.	16
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EXHIBIT 114

1 UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF DELAWARE

3 THOMSON REUTERS ENTERPRISE)
4 CENTRE GMBH and WEST)
5 PUBLISHING CORPORATION,)
6 Plaintiffs and)
7 Counterdefendants,)
8 vs.) C.A. No. 20-613 (LPS)
9 ROSS INTELLIGENCE, INC.,)
10 Defendant and)
11 Counterplaintiff.)
12 _____)

13 **HIGHLY CONFIDENTIAL**

14 VIDEOTAPED 30(b)(6) DEPOSITION OF DEFENDANT,

15 by and through its corporate designee

16 TOMAS VAN DER HEIJDEN,

17 (also in his individual capacity)

18 London, England, United Kingdom

19 Thursday, March 17, 2022

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24 Pages: Pages 1 - 443

25 Reported stenographically by:

LEAH M. WILLERSDORF, RPR-CRR-FBIVR-ACR-QRR2-CLR

Tomas van der Heijden
March 17, 2022

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4 Thursday, March 17, 2022

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09:29 a.m.

(Greenwich Mean Time)

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9 Videotaped 30(b)(6) deposition of Defendant, by
10 and through its corporate representative Tomas van der
11 Heijden, as well as in his individual capacity, held
12 at the offices of Kirkland & Ellis International LLP,
13 30 St. Mary Axe, London EC3A 8AF, England, United
14 Kingdom, before Leah Willersdorf, Registered
15 Professional Reporter and Certified Realtime Reporter
16 with the US National Court Reporters Association,
17 and Accredited Court Reporter, Qualified Realtime
18 Reporter (Level 2) and Fellow of the British Institute
19 of Verbatim Reporters, and Certified LiveNote
20 Reporter.

21

22

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Tomas van der Heijden
March 17, 2022

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1 A P P E A R A N C E S

2

3 On behalf of Plaintiffs and Counterdefendants:

4 KIRKLAND & ELLIS, LLP

5 601 Lexington Avenue
6 New York, New York 10022
6 (212) 446 4800

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8 joshua.simmons@kirkland.com
9 jennifer.gibbins@kirkland.com

10 On behalf of Defendant and Counterplaintiff:

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15 BY: KAYVAN M. GHAFFARI, ESQ.
16 kghaffari@crowell.com

17 ALSO PRESENT:

18 Linda Fleet - Videographer

445

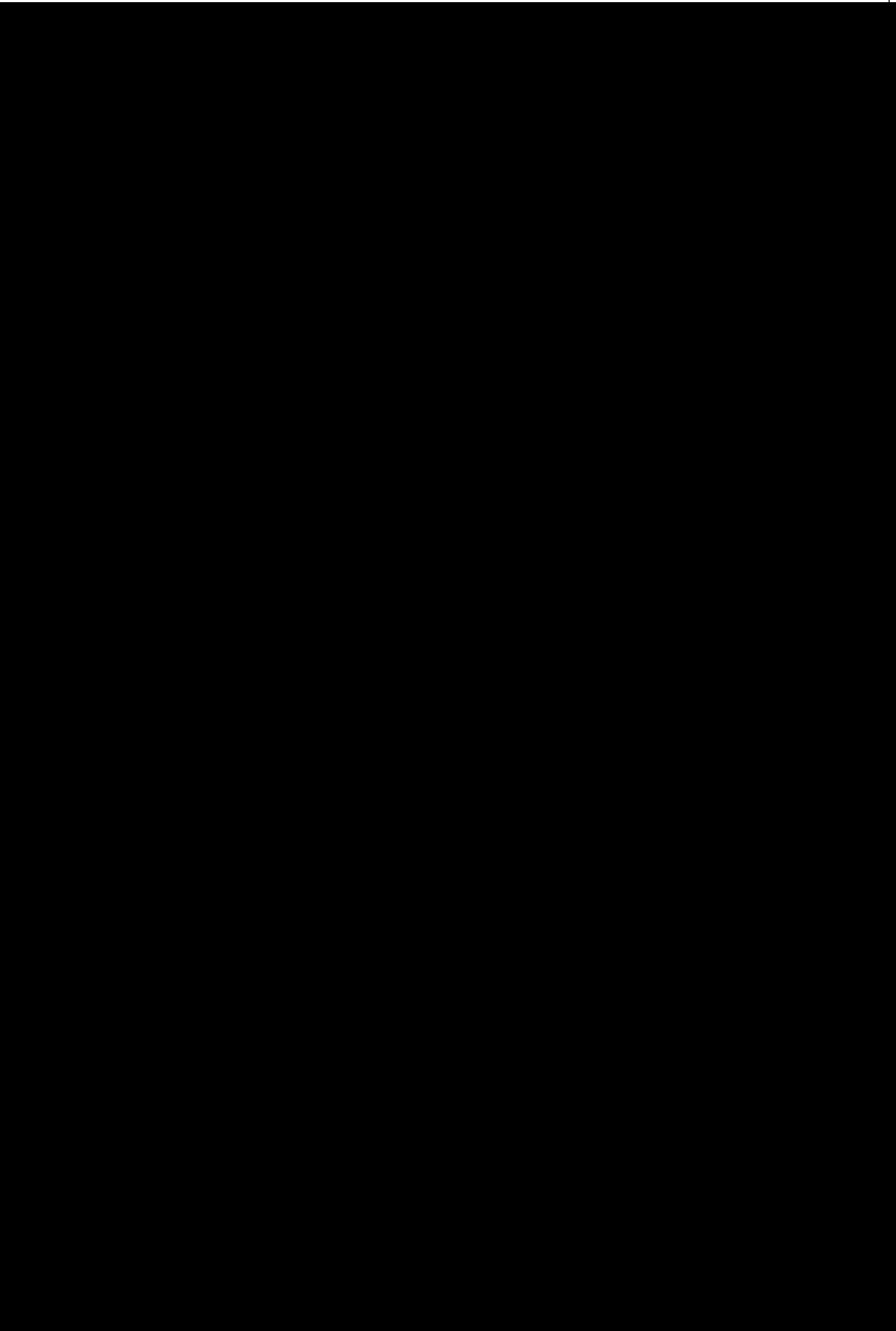


EXHIBIT 115

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE
3 NO. 1:20-cv-00613-UNA.

4

5 -----

6 THOMSON REUTERS ENTERPRISE
7 CENTRE GMBH and WEST PUBLISHING
8 CORPORATION,

9 Plaintiffs,

10 -vs-

11 ROSS INTELLIGENCE INC.,

12 Defendant.

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16 CONFIDENTIAL - ATTORNEYS' EYES ONLY

17 REMOTE TESTIMONY OF ANDREW ARRUDA

18 MAY 19, 2023 - 7:58 A.M. PDT

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24 JOB NO. 2023-895666

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3 MAY 19, 2023

4 7:58 A.M. PDT

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6
7 DEPOSITION of ANDREW ARRUDA, before S.
8 Arielle Santos, Certified Court Reporter,
9 Certified LiveNote Reporter and Notary Public.

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Andrew Arruda
May 19, 2023

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1 REMOTE APPEARANCES:

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16 ALSO PRESENT:

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18 BRYAN BELTRAN, Lexitas

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EXHIBIT 116

EXHIBIT 117

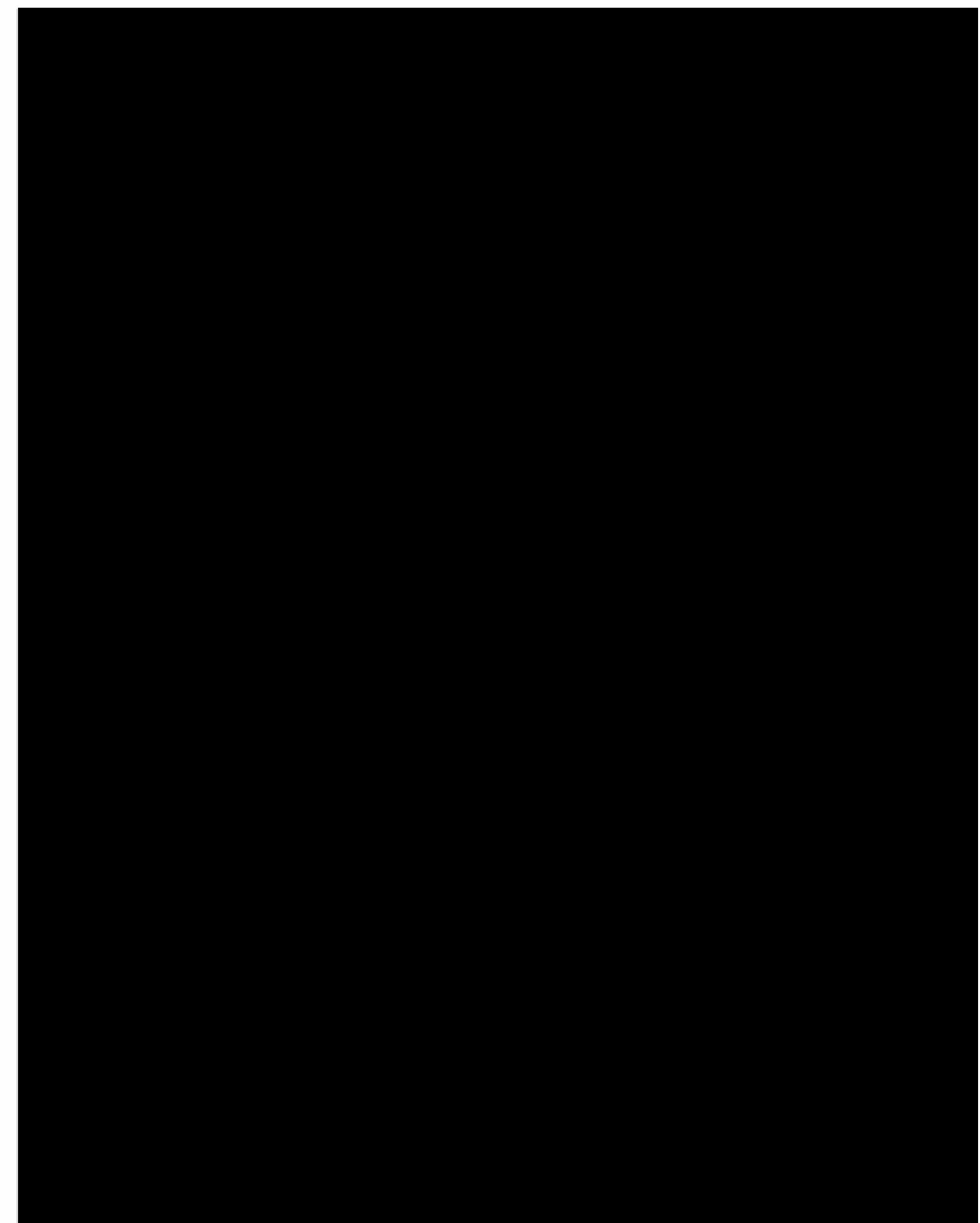


EXHIBIT 118

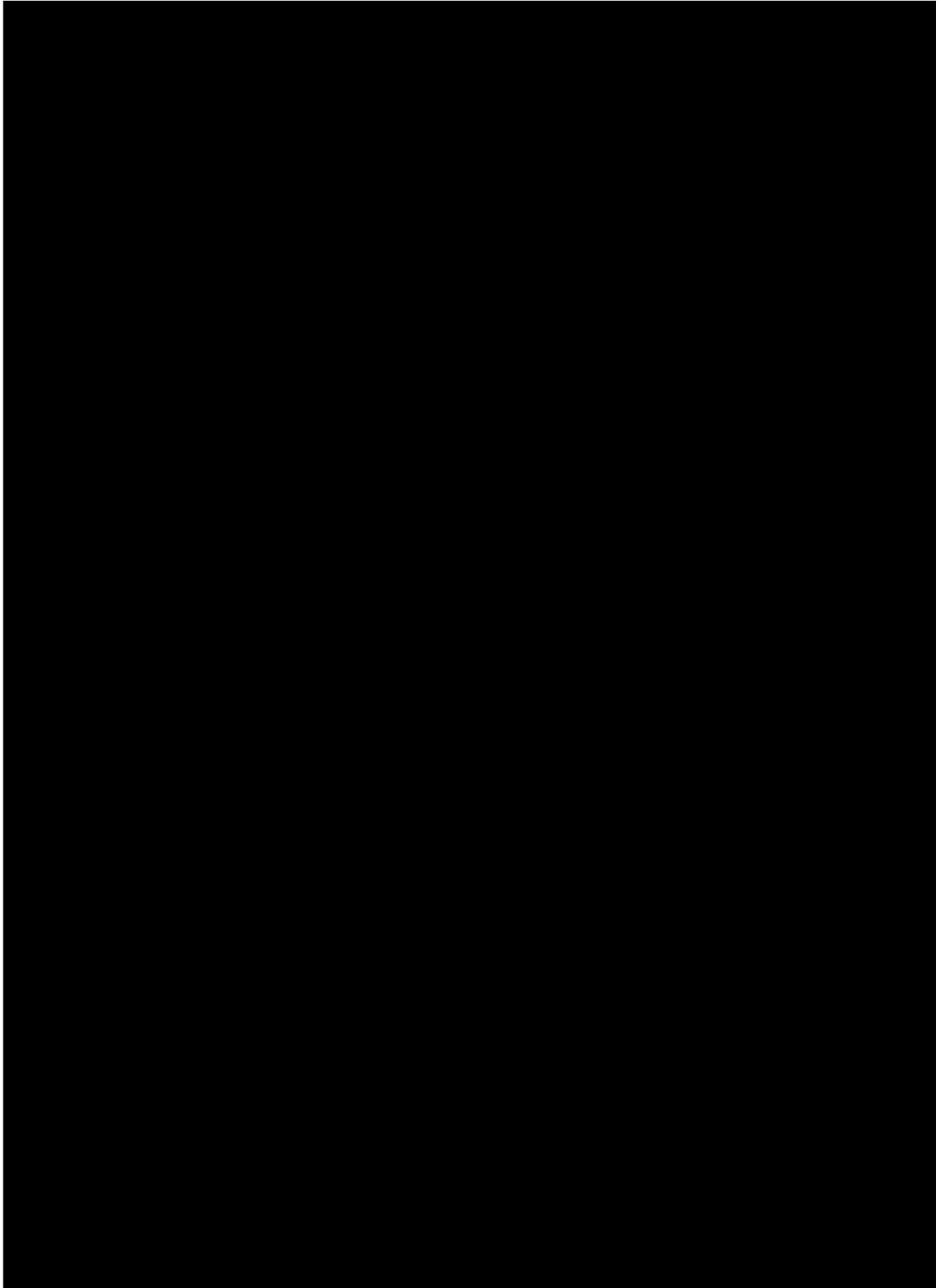


EXHIBIT 119

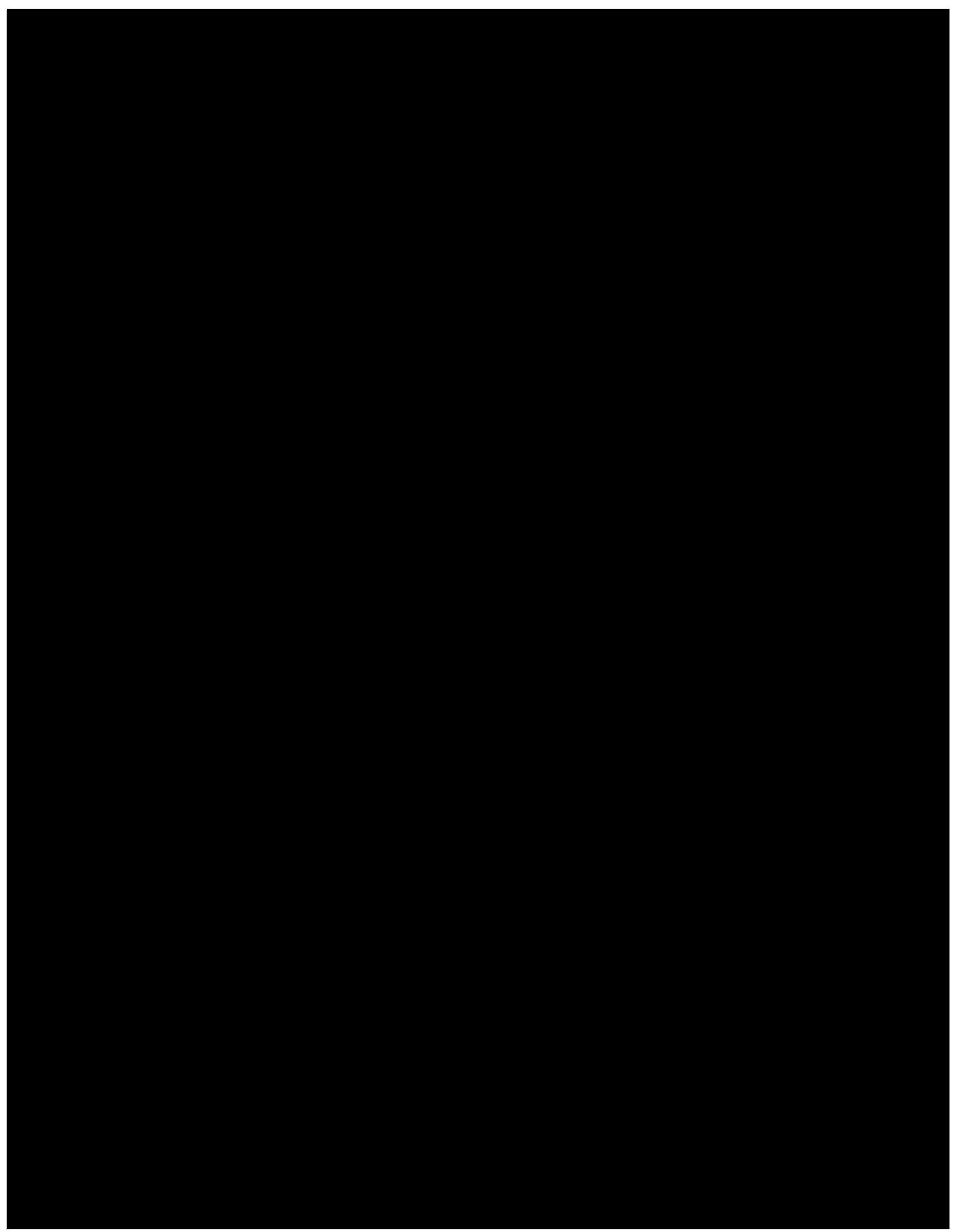


EXHIBIT 120

